

I drive for a regional "less than truckload" company, most of the trucks we use are not assigned to a single driver. The city pick up and delivery (day) drivers and linehaul city to city (night) drivers both share trucks with some drivers using two different trucks a day and more than two a week. EOBR devices would never be able to tell how many hours an individual driver works.

Second point: all of our drivers including the sleeper drivers use pay-sheets and punch a clock at every terminal and turn in receipts for fuel, etc. Any manager could tell how many hours we are driving. We are also tracked with toll card usage, I-Pass records, and any other document that can be subpoenaed. My company doesn't use Qual-quom another tracking device.

How much evidence do the safety people need to prove I'm innocent. What about my 5th amendment rights?

Of course I bring up the obvious civil rights that are being infringed upon by an organizations (special interest groups). The thought that somebody is interested in my safety is touching, but when the enforcement agencies start touching my wallet, I start to think even they are not really interested in my "Safety".

Another point to be studied is who is going to pay for the installation, maintenance and training. Both technology challenged drivers and enforcement personnel will need to be trained at a cost to trucking companies and taxpayers. Many trucking companies are having a hard time paying the bills and would have a hard time passing the cost on to the customers. Not to mention the cost of more experienced safe drivers leaving the field and being replaced with inexperienced drivers with little or no training.

I did read about halfway through the Federal register detailing the FMSCA first revision of HOS which were stopped because they were too complex. Within the comments for the current rules, I noted that the PATT organization is aware of the problem of uncompensated dock wait time being logged "off duty". But installing EOBR devices doesn't seem to address that problem. 12 hours loading time could be confused with 10 hours off duty and 2 hours loading. What really happened? Nobody knows.

I do like the current rules as they are. The 10 off is good, giving me enough time to sleep, shower and prepare a meal. The 34 hour reset allows me to work a 10 hour day or a 14 hour day without worrying about how it will affect my recap next week. Nothing like having only 6 hours to work on a given day because of something that happened last week. I just can't imagine what a person would do if he could only drive 8 hours and had to shut down at a truckstop for 16 hours to keep the 24 hour "cycle".

My final point is a question. Why is it right for a government banking regulatory agency to tap a banking executive to head the agency? But why is it wrong for a transportation safety agency to hire a trucking company executive to help run the agency?